

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TWANA AHMED, :
 :
 Plaintiff, :
 :
 VS. : C.A. NO. 4:23-cv-02823
 :
 UNIVERSAL PROTECTION :
 SERVICE, LP d/b/a :
 ALLIED UNIVERSAL :
 SECURITY SERVICES, :
 :
 Defendant. :

ORAL AND VIDEOTAPED DEPOSITION OF
TWANA AHMED

SEPTEMBER 19, 2024

THE ORAL AND VIDEOTAPED DEPOSITION OF
TWANA AHMED, produced as a witness at the instance of
the Defendant, and duly sworn, was taken in the
above-styled and numbered cause on the 19th day of
September, 2024, from 9:45 a.m. to 6:58 p.m., before
Andrea L. Desormeaux, CSR in and for the State of
Texas, reported by machine shorthand, at the offices of
Vorys, Sater Seymour & Pease, 909 Fannin, Suite 2700,
Houston, Texas, pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record or
attached hereto.

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A P P E A R A N C E S

FOR THE PLAINTIFF:

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10 REPORTER'S CERTIFICATION
11 DEPOSITION OF TWANA AHMED
12 TAKEN ON SEPTEMBER 19, 2024

13 I, ANDREA L. DESORMEAUX, Certified Shorthand
14 Reporter, hereby certify to the following:

15 That the witness, TWANA AHMED, was duly sworn by
16 the officer and that the transcript of the oral
17 deposition is a true record of the testimony given by
18 the witness;

19 That the deposition transcript was submitted on
20 _____, _____, to the witness or to the
21 attorney for the witness for examination, signature and
22 return to me by _____;

23 That the amount of time used by each party at the
24 deposition is as follows:

25 Mr. Shine - (06:53:50)
Ms. Hernandez - (00:46:07)

That pursuant to information given to the
deposition officer at the time said testimony was
taken, the following includes counsel for all parties
of record:

Ms. Amanda C. Hernandez, attorney for Plaintiff.
Mr. Nathan A. Shine, attorney for Defendant.

I further certify that I am neither counsel for,

1 related to, nor employed by any of the parties or
2 attorneys in the action in which this proceeding was
3 taken, and further that I am not financially or
4 otherwise interested in the outcome of the action.

5 Certified to by me this ____ day of _____,
6 _____.

7
8 ANDREA L. DESORMEAUX, TEXAS CSR NO. 4835
9 Expiration Date: July 31, 2026
10 CONTINENTAL COURT REPORTERS, INC.
11 Firm Registration No. 61
12 Expiration Date: January 31, 2025
13 Two Riverway Building
14 2 Riverway, Suite 750
15 Houston, Texas 77056
16 (713) 522-5080
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Twana Ahmed - September 19, 2024

13

09:53:09 1 A. I don't remember that, no.

09:53:17 2 Q. Twana, I just want to go through a couple of
09:53:27 3 background questions with you. Can you please state
09:53:30 4 your full legal name for the record.

09:53:33 5 A. Twana, first name. Last name is Ahmed.

09:53:37 6 Q. Do you have a middle name?

09:53:38 7 A. Don't use one. Don't have one.

09:53:40 8 Q. And it's my understanding that you speak
09:53:42 9 multiple languages; is that correct?

09:53:43 10 A. That's correct.

09:53:44 11 Q. How many languages do you speak?

09:53:47 12 A. Kurdish, Arabic, English.

09:53:47 13 THE REPORTER: Can you speak up for me?

09:53:48 14 A. Like four languages. Four or three languages.

09:53:52 15 Q. And what languages are those?

09:53:54 16 A. English, Kurdish, and Arabic.

09:54:00 17 Q. I'm sorry. English and what was the middle
09:54:02 18 one?

09:54:02 19 A. Kurdish and Arabic.

09:54:03 20 Q. Okay. And what's your fluency level with
09:54:06 21 English?

09:54:07 22 A. I speak English well but it's not my mother
09:54:10 23 language.

09:54:10 24 Q. Okay.

09:54:12 25 A. There's things I might understand and there's

Twana Ahmed - September 19, 2024

57

11:05:35 1 A. Tall, short hair, young black lady.

11:05:38 2 Q. And is -- did you complete this form?

11:05:52 3 A. Yes. The checkmark, I see it.

11:06:04 4 Q. And what's after the checkmark? Or

11:06:09 5 underneath, I should say, the checkmark.

11:06:11 6 A. My name. 12/15/2021 -- 2021, 2:48.

11:06:21 7 Q. I'm sorry. What was the last part?

11:06:24 8 A. 2:48 p.m.

11:06:28 9 Q. And finally, can you please flip to AUS 71.

11:06:49 10 A. Yes.

11:06:50 11 Q. And at the top of the page, it says,

11:06:52 12 "Arbitration Policy and Agreement." Did I read that

11:06:56 13 correctly?

11:06:59 14 A. Yes.

11:07:00 15 Q. This policy covers a couple of pages. If you

11:07:04 16 flip to AUS 77.

11:07:16 17 A. I see that.

11:07:16 18 Q. Did you complete this form?

11:07:17 19 A. It looks like I checked it, yes.

11:07:20 20 Q. And what's next to the checkmark?

11:07:21 21 A. My name, day and -- month and day and year and

11:07:28 22 time.

11:07:28 23 Q. And what date and time is listed?

11:07:30 24 A. 12/15/21 -- 2021, 2:35 p.m.

11:07:38 25 Q. I know we only reviewed a few of these forms,

11:10:00 1 Q. (By Mr. Shine) I'm handing you a copy of
11:10:02 2 Allied's policy for detention and legal arrest as it's
11:10:07 3 contained within its employee handbook. Have you seen
11:10:12 4 this or read this policy before?

11:10:14 5 A. I might but don't remember exactly.

11:10:20 6 Q. Twana, why would you sign and acknowledge that
11:10:27 7 you had received the handbook if you didn't intend to
11:10:30 8 read it?

11:10:31 9 A. Because when they give us something, they
11:10:36 10 don't give us the opportunity to review the form
11:10:38 11 because they want us to be done with it fast as we
11:10:41 12 could. Like basically just check, check, hit next,
11:10:50 13 check, hit next, check, hit next, check, hit next.

11:10:53 14 Q. But would you agree with me that you testified
11:10:56 15 you had to enter information like your checking
11:10:59 16 account, your emergency contact information, your tax
11:11:05 17 withholding information? So you did actually have to
11:11:07 18 do some additional work, right?

11:11:09 19 A. The -- when it comes to that, yeah. We had to
11:11:12 20 fill up the bank account informations because that's
11:11:19 21 how I get my pay.

11:11:20 22 Q. So is it -- do you think that the policies
11:11:29 23 don't apply to you because you didn't read them?

11:11:31 24 A. No. The policy applies to everybody when you
11:11:35 25 are employed by the company.

05:07:10 1 A. In the US, no. Like, I graduated high school
05:07:15 2 not over here.

05:07:16 3 Q. Where did you graduate high school?

05:07:17 4 A. Overseas.

05:07:18 5 Q. And where is overseas?

05:07:20 6 A. Iraq.

05:07:21 7 Q. What year did you come to the United States?

05:07:31 8 A. 2012, 2011. Somewhere around there.

05:07:38 9 Q. What made you decide to -- did you move to the
05:07:41 10 United States at that point?

05:07:45 11 MS. HERNANDEZ: Objection. I'm going to
05:07:47 12 have to instruct the witness not to answer on the
05:07:50 13 grounds that there's a privacy and safety issue that
05:07:54 14 would put his life in danger.

05:08:00 15 MR. SHINE: Can we go off the record,
05:08:02 16 please?

05:08:03 17 THE VIDEOGRAPHER: Off the record at
05:08:06 18 5:07.

05:09:00 19 (Off the record 5:07 p.m. to 5:09 p.m.)

05:09:04 20 THE VIDEOGRAPHER: Back on the record at
05:09:24 21 5:09.

05:09:26 22 Q. (By Mr. Shine) Twana, based on my
05:09:28 23 conversation with counsel off the record, we're going
05:09:31 24 to move on from the last question, so you do not need
05:09:33 25 to answer that.

Twana Ahmed - September 19, 2024

263

05:09:34 1 A. Thank you.

05:09:34 2 Q. Other than high school, have you pursued any
05:09:37 3 further education? Like, did you go to college or get
05:09:44 4 any other degree?

05:09:45 5 A. I got a degree, certification, if you call
05:09:47 6 them degrees. Like, for example, the security
05:09:50 7 certifications for the commissioned officer, like, be
05:09:54 8 armed. And certification for noncommissioned officer,
05:09:57 9 that's the unarmed license for -- certified license for
05:10:06 10 forklift, if you want to call that a certification.

05:10:08 11 Q. Okay.

05:10:09 12 A. I'm licensed at CPR. Would you call that a
05:10:20 13 license?

05:10:20 14 Q. Sure.

05:10:20 15 A. I have that too, CPR license.

05:10:23 16 Q. Okay. Any other additional schooling, like at
05:10:28 17 a university or a college that you attended?

05:10:31 18 A. I can't recall, no.

05:10:36 19 Q. And it's my understanding that you may have
05:10:41 20 served in the US military; is that correct?

05:10:44 21 A. I have some experience, yes. Some
05:10:52 22 affiliation -- affiliation to the military, yes.

05:10:54 23 Q. When you say "affiliation to the military," is
05:10:57 24 it the US military?

05:10:59 25 A. Yes.

Twana Ahmed - September 19, 2024

264

05:10:59 1 Q. And which branch?

05:11:00 2 A. Multiple different branches.

05:11:03 3 Q. Okay. Including which branches?

05:11:05 4 A. Army and Marine Corps.

05:11:13 5 Q. What did you do in the Army?

05:11:15 6 A. Did for the Army? I did linguistic and things
05:11:25 7 like that.

05:11:26 8 Q. And what did you do with the Marine Corps?

05:11:28 9 A. Same thing.

05:11:29 10 Q. Were you assigned -- were you considered sort
05:11:31 11 of active duty in those roles?

05:11:34 12 A. I don't know if you want to call them active
05:11:36 13 duty or not. It was translation job. I don't know
05:11:42 14 what you mean by, like, active duty.

05:11:43 15 Q. Sure. Did you work as a civilian translator
05:11:47 16 for the Army and the Marine Corps, or were you an
05:11:52 17 enlisted member?

05:11:53 18 A. I was -- with both of them at the time was --
05:11:58 19 I had a uniform but it was civilian, I believe.

05:12:02 20 Q. Okay. And when did you work for the Army?

05:12:07 21 A. A long time ago. And the Marine Corps was a
05:12:12 22 long time ago.

05:12:13 23 Q. When you say "a long time ago," was that five
05:12:16 24 years ago?

05:12:17 25 A. Oh, more than that.